

4. Defendant lacks sufficient information to form a belief as to the truth of the allegations contained in Paragraph No. 4 of Plaintiffs' Complaint.

5. Paragraph No. 5 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response.

6. As to Paragraph No. 6 of Plaintiffs' Complaint, Plaintiffs do not state with specificity when they alleged Defendant was aware, and thus, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 6.

7. Defendant lacks sufficient information to form a belief as to the truth of the allegations contained in Paragraph No. 7 of Plaintiffs' Complaint. Defendant further denies that Plaintiffs are entitled to any of the relief sought herein.

**THE JURISDICTION, VENUE, CORE PROCEEDING, LEGAL BASIS AND
AUTHORITY OF THE BANKRUPTCY COURT TO ISSUE FINAL JUDGMENT**

8. Paragraph No. 8 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response. To the extent a response is required, Defendant admits that this Court has jurisdiction over this action and that venue is proper. Defendant, however, denies that it is a proper party to this action.

**THE FACTUAL BACKGROUND IN SUPPORT
OF THE PLAINTIFFS' CAUSE OF ACTION**

9. Defendant lacks sufficient information to form a belief as to the truth of the allegations contained in Paragraph No. 9 of Plaintiffs' Complaint.

10. Defendant admits that State Farm Bank, F.S.B. has ceased operations. Defendant denies that it is operated or controlled by "State Farm Insurance" and that it has any interest in the vehicle at issue. Defendants otherwise lacks sufficient information to form a belief as to the truth of the allegations contained in Paragraph No. 10 of Plaintiffs' Complaint.

11. Paragraph No. 11 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response.

12. Paragraph No. 12 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response.

13. Paragraph No. 13 of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves.

14. Paragraph No. 14 of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves.

15. Paragraph No. 15, including subparts a. – f., of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves.

16. Paragraph No. 16 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response. To the extent a response is required, Defendant denies that it holds an interest in the vehicle at issue or that it is properly listed as a creditor in Plaintiffs' bankruptcy petition.

17. Paragraph No. 17 of Plaintiffs' Complaint states a legal conclusion, and thus, warrants no response. To the extent a response is required, Defendant denies that it holds an interest in the vehicle at issue or that it is properly listed as a creditor in Plaintiffs' bankruptcy petition.

18. Paragraph No. 18 of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves.

19. Paragraph No. 19, including subparts a. – c., of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves. As to subpart d., Defendant denies that it received written notice of Plaintiffs' bankruptcy Petition on June 2, 2022.

20. Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 20 of Plaintiffs' Complaint.

21. As to Paragraph No. 21 of Plaintiffs' Complaint, including subparts a. – d., Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 21 of Plaintiffs' Complaint, including subparts a. – d.

22. As to Paragraph No. 22 of Plaintiffs' Complaint, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 22 of Plaintiffs' Complaint.

23. As to Paragraph No. 23 of Plaintiffs' Complaint, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 23 of Plaintiffs' Complaint.

24. Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 24 of Plaintiffs' Complaint.

25. As to Paragraph No. 25 of Plaintiffs' Complaint, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 25 of Plaintiffs' Complaint.

26. As to Paragraph No. 26 of Plaintiffs' Complaint, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 26 of Plaintiffs' Complaint.

27. As to Paragraph No. 27 of Plaintiffs' Complaint, Defendant states that the referenced and quoted documents speak for themselves. Otherwise, Defendant lacks sufficient information to form a belief as to the truth of the allegations in Paragraph No. 27, including subparts a through d.

28. Paragraph No. 28 of Plaintiffs' Complaint references Plaintiffs' bankruptcy filings and contents of the filings. Defendant states that the filings speak for themselves.

29. Paragraph No. 29 of Plaintiffs' Complaint general states Plaintiffs' request for non-economic damages, and thus, warrants no response. To the extent a response is required, Defendant denies Plaintiffs are entitled to the relief herein including all subparts.

**THE REQUEST FOR A FINDING OF A WILLFUL AND/OR
INTENTIONAL VIOLATION OF THE AUTOMATIC STAY**

30. Paragraph No. 30 of Plaintiffs' Complaint restates by reference above-stated allegations, and thus, warrants no response. To the extent a response is required, Defendant admits, denies, or lacks sufficient information to admit or deny each allegation as stated above.

31. The allegations contained in Paragraph No. 31 of Plaintiffs' Complaint are legal conclusions to which no response is required.

32. As to Paragraph No. 32 of Plaintiffs' Complaint, Plaintiffs do not specify when they allege Defendant received written notice of the bankruptcy Petition, therefore, Defendant denies the allegations in this paragraph.

33. Defendant denies the allegations contained in Paragraph No. 33 of Plaintiffs' Complaint.

34. The allegations contained in Paragraph No. 34 of Plaintiffs' Complaint are legal conclusions to which no response is required.

35. The allegations contained in Paragraph No. 35 of Plaintiffs' Complaint are legal conclusions to which no response is required.

**REQUEST TO FURTHER ENFORCEMENT OF THE ORDERS, INJUNCTIONS
AND/OR RULE ARISING UNDER THIS BANKRUPTCY**

36. Paragraph No. 36 of Plaintiffs' Complaint restates by reference above-stated allegations, and thus, warrants no response. To the extent a response is required, Defendant admits, denies, or lacks sufficient information to admit or deny each allegation as stated above.

37. Paragraph No. 37 of Plaintiffs' Complaint, including subparts a. – c., states Plaintiffs' requests for relief to which no response is required. To the extent Paragraph No. 37 contains factual allegations to which a response is required, Defendant denies the allegations in Paragraph No. 37, including all subparts.

REQUEST AN AWARD OF DAMAGES

38. Paragraph No. 38 of Plaintiffs' Complaint restates by reference above-stated allegations, and thus, warrants no response. To the extent a response is required, Defendant admits, denies, or lacks sufficient information to admit or deny each allegation as stated above.

39. Paragraph No. 39 of Plaintiffs' Complaint, including subparts a. – d., states Plaintiffs' requests for relief to which no response is required. To the extent Paragraph No. 39 contains factual allegations to which a response is required, Defendant denies the allegations in Paragraph No. 39.

40. Paragraph No. 40 of Plaintiffs' Complaint, including subparts a. – e., states Plaintiffs' requests for relief to which no response is required. To the extent Paragraph No. 40 contains factual allegations to which a response is required, Defendant denies the allegations in Paragraph No. 40.

41. The allegations contained in Paragraph No. 41 of Plaintiffs' Complaint are legal conclusions to which no response is required.

42. Additionally, the unnumbered paragraph and numbered paragraph 1. – 5. following Paragraph No. 41 contain Plaintiffs’ prayer/requests for relief, to which no response is required. To the extent a response is required, Defendant denies the allegations contained in subparts 1. – 5. Defendant further denies Plaintiffs are entitled to any of the relief sought by way of this action.

PRAYER

For these reasons, Defendant prays that, upon final trial and hearing of this lawsuit, Plaintiffs takes nothing and that Defendant recovers its costs, fees, and expenses, and for such other and further relief to which Defendant may show itself justly entitled, both in law and at equity.

Respectfully submitted,

/s/ Susan E. Egeland
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure August 1, 2022.

/s/ Susan E. Egeland

SUSAN E. EGELAND